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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, WILLIAM BYATT,
 JEREMY DAVIS, CHRISTOPHER
 CASTILLO, and MONIQUE TRUJILLO
 individually and on behalf of all similarly
 situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

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 Steven M. Shepard (admitted *pro hac vice*)
 Alexander Frawley (admitted *pro hac vice*)
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Case No.: 4:20-cv-03664-YGR-SVK

**PLAINTIFFS' [PROPOSED] ORDER
 REGARDING PLAINTIFFS'
 OBJECTIONS TO THE SPECIAL
 MASTER'S REPORT AND
 RECOMMENDATION (DKT. 524)**

The Honorable Susan van Keulen
 Courtroom 6 – 4th Floor
 Date: May 3, 2022
 Time: 2:00 PM

[PROPOSED] ORDER ON PLAINTIFFS' OBJECTIONS

Before the Court is the Special Master's Report and Recommendation for a preservation plan (Dkt. 524) (the "Special Master's Report"), as well as the parties' separately filed objections to the Special Master's Report, each filed on April 15, 2022. Having considered the Special Master's Report, and the parties' objections thereto, the Court **ADOPTS** the following aspects of Plaintiffs' Objections:

1. The Special Master's Report establishes that Google did not meet its preservation obligations in this litigation.

2. Google has not met its legal obligation of demonstrating that preservation of a substantially narrowed, relevant subset of records in Google's logs would be unduly burdensome and not proportional to the litigation.

3. A sampling-based preservation plan is not warranted in this matter. Any sampling-based preservation plan would result in unfair prejudice to Plaintiffs and Class Members.

4. Google shall preserve the following for all U.S.-based Google Account holders:

- All sources identified in the Special Master's Report
- The [REDACTED]. Although Google has represented that this log is stored permanently, the Court finds good cause to order that Google continue to preserve all information contained in this log.
- All [REDACTED] for the [REDACTED]
[REDACTED]
[REDACTED].
- All [REDACTED] that could be used to [REDACTED]
[REDACTED]
[REDACTED].

5. Google's preservation of this information shall be required through a final judgment in this matter.

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IT IS SO ORDERED.

DATED: _____

Honorable Susan van Keulen
United States Magistrate Judge